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May 2, 2014

Via e-mail: Forrestnysdchambers@nysd.uscourts.gov

Honorable Katherine B. Forrest
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

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Re: Deborah Peterson, et al. v. Islamic Republic of Iran, et al.;
Case No. 13 CIV 9195 (KBF)

Dear Judge Forrest:

In accordance with Your Honor's Order of April 28, 2014, which was filed under seal, we write on behalf of all parties to propose a course of action for resolving the Plaintiffs' Section 1610(c) Application and the responses of the defendants, Clearstream and Banca UBAE, to the Amended Complaint. We believe that all of the motions currently pending require some modification, and therefore propose that they be refiled with the following briefing schedule:

- May 16, 2014 - Plaintiffs' file their 1610(c) motion on notice to all parties.
June 6, 2014 - Clearstream responds to 1610(c) motion, and Clearstream and Banca UBAE answer, move against, or otherwise respond to the Amended Complaint.
June 20, 2014 - Plaintiffs reply on their 1610(c) motion.
July 11, 2014 - Plaintiffs file any oppositions to Defendants' motions directed against the Amended Complaint.
July 25, 2014 - Defendants file their respective replies to Defendants' opposition.

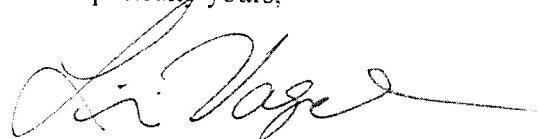
Plaintiffs'

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Your Honor's endorsed Order of April 28, 2014, granted Clearstream and UBAE access to filings under seal in this action. The parties respectfully request that access to all filings under seal be given to JP Morgan Chase Bank, N.A., who has been named in the Amended Complaint. JP Morgan is represented by Steven Feigenbaum, Esq. of the firm of Levi Lubarsky & Feigenbaum LLP, and he has been advised that we would be making this request.

Respectfully yours,



Liviu Vogel

LV:rej

cc: All counsel of record by email

So ordered.

K.B. For

5/2/14

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